

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

**ALPHONSO DAVID,**

**Plaintiff,**

**v.**

**THE HUMAN RIGHTS CAMPAIGN AND  
THE HUMAN RIGHTS CAMPAIGN  
FOUNDATION,**

**Defendants.**

**Case No. 1:22-cv-00620**

**Judge Roanne L. Mann**

**Jury Trial Demanded**

**JOINT STATUS REPORT**

Pursuant to this Court's September 23, 2022, Order ("Order"), the Parties submit the following status report:

Defendants have clarified that the requests referenced in the Order are limited to the time period from June 1, 2019, through the present. In light of that clarification, and the Court's Order, Plaintiff will promptly produce any documents responsive to Defendants' Requests 45, 46, and 71 as narrowed, and to Defendants' Requests 77 and 78.

The Parties mutually believe a reasonable extension of the current discovery schedule is necessary to complete discovery in an orderly and efficient manner. Pursuant to this Court's standing order, the Parties will contemporaneously file separately a joint letter motion for extension of the discovery schedule and update the Court on the progress of discovery to date.

Dated: October 12, 2022.

Respectfully submitted,

/s/ Evan D. Parness

/s/ Matt Singer

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